

**IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF NEW YORK**

CHASE WILLIAMS AND WILLIAM  
ZHANG, individually and on behalf of all  
others similarly situated,

Plaintiffs,

v.

BLOCK.ONE, BRENDAN BLUMER, and  
DANIEL LARIMER,

Defendants.

Civ. No. 1:20-cv-02809-LAK

CLASS ACTION

CRYPTO ASSETS OPPORTUNITY FUND  
LLC and JOHNNY HONG, Individually and  
on Behalf of All Others Similarly Situated,

Plaintiffs,

v.

BLOCK.ONE, BRENDAN BLUMER,  
DANIEL LARIMER, IAN GRIGG, and  
BROCK PIERCE,

Defendants.

Civ. No.: 1:20-cv-3829

CLASS ACTION

**DECLARATION OF DANIEL L. BERGER IN SUPPORT OF MOTION OF  
THE CRYPTO ASSETS OPPORTUNITY FUND, LLC FOR  
CONSOLIDATION OF ACTIONS, APPOINTMENT OF LEAD PLAINTIFF, AND  
APPROVAL OF LEAD COUNSEL SELECTION**

I, Daniel L. Berger, declare as follows:

1. I am a Director of Grant & Eisenhofer P.A. (“Grant & Eisenhofer”), 485 Lexington Avenue, New York, NY 10017, co-counsel for Crypto Assets Opportunity Fund, LLC (“CAOF”).

2. I submit this declaration in support of CAO's motion pursuant to Rule 42 of the Federal Rules of Civil Procedure and Section 21D of the Securities Exchange Act of 1934, as amended by the Private Securities Litigation Reform Act of 1995 (the "PSLRA"), 15 U.S.C. § 78u-4, for an order: (1) consolidating the above-captioned related cases; (2) appointing CAO as Lead Plaintiff in the consolidated action; and (3) approving CAO's selection of Grant & Eisenhofer and the Bluhm Legal Clinic of the Northwestern Pritzker School of Law Complex Civil Litigation and Investor Protection Center as Lead Counsel for the proposed class.

3. Attached hereto as Exhibit A is a true and correct copy of the first public notice announcing the pendency of *Williams v. Block.one et al.*, No. 1:20-cv-02809, published on April 8, 2020 through *Business Wire*.

4. Attached hereto as Exhibit B is a true and correct copy of the public notice announcing the pendency of *Crypto Assets Opportunity Fund LLC v. Block.one et al.*, No. 1:20-cv-3829, published on May 18, 2020 through *PR Newswire*.

5. Attached hereto as Exhibit C is the certification of CAO pursuant to the PSLRA.

6. Attached hereto as Exhibit D is the firm biography of Grant & Eisenhofer.

7. Attached hereto as Exhibit E is the biography of J. Samuel Tenenbaum, the Director of the Bluhm Legal Clinic of the Northwestern Pritzker School of Law Complex Civil Litigation and Investor Protection Center.

I declare under penalty of perjury that the foregoing is true and correct.

Executed in New York, New York on June 8, 2020.

/s/ Daniel L. Berger  
Daniel L. Berger